

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

USAMA JAMIL HAMAMA,
ATHEER FAWOZI ALI,
ALI AL-DILAIMI,
HABIN NISSAN,
JIHAN ASKER,
MOAYAD JALAL BARASH,
SAMI ISMAEL AL-ISSAWI,

Petitioners,

v.

Civil No. 17-11910
Hon. MARK A. GOLDSMITH
Mag. Judge DAVID R. GRAND

REBECCA ADDUCCI, Detroit
Field Director, Immigration and
Customs Enforcement,

Respondent.

DECLARATION OF ROBERT K. LYNCH, JR.

I, Robert K. Lynch, Jr., make the following declaration.

1. I am a Deputy Field Office Director employed by the United States Department of Homeland Security (DHS), U.S. Immigration and Customs Enforcement (ICE), Enforcement and Removal Operations (ERO) in Detroit, Michigan. I have been employed with ICE and its predecessor (Immigration and Naturalization Service) since 1995. I have been in my current position as a Deputy Field Office Director with ICE/ERO at the Detroit Field Office since October 28,

2016. The Detroit Field Office consists of the States of Michigan and Ohio.

2. My duties include, among other things, to locate and/or apprehend aliens; prepare, present and defend deportation or exclusion proceedings, ensuring the physical removal of aliens from the United States at various stages of their deportation/exclusion proceedings, and ensuring the execution of final orders of removal. The subject matter of this declaration involves my official duties as an ICE Deputy Field Office Director, and is based on personal knowledge and information made known to me in the course of my professional duties.

3. I am aware of the case of Abdulkuder Hashim Al-Shimmery, [REDACTED]. Al-Shimmery was arrested and detained by ERO in Nashville, Tennessee, for execution of his outstanding order of removal to Iraq. Tennessee is not within the jurisdiction of the Detroit Field Office. On or about June 15, 2017, Al-Shimmery filed a motion to reopen and stay with the BIA. These motions remain pending.

4. I am aware of the case of Qassim Hashem Al-Saedy, [REDACTED]. Al-Saedy was arrested and detained by ERO in Nashville, Tennessee, for execution of his outstanding order of removal to Iraq. Tennessee is not within the jurisdiction of the Detroit Field Office. On June 22, 2017, an immigration judge granted Al-Saedy a stay of removal pending review of a motion to reopen.

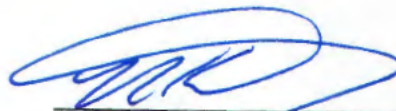
5. I am aware of the case of Abbas Oda Manshad Al-Sokaini [REDACTED]

■. Al-Sokaini was arrested and detained by ERO in Albuquerque, New Mexico, for execution of his outstanding order of removal to Iraq. New Mexico is not within the jurisdiction of the Detroit Field Office.

6. According to information provided to me by ICE's Detroit Office of the Chief Counsel (OCC Detroit), as of June 25, 2017, approximately 79 Iraqi nationals arrested and detained in Michigan and Ohio for the purpose of executing their final orders of removal to Iraq, have filed motions to reopen their removal proceedings in the immigration court and/or the BIA, and 27 have received stays of their removal pending review of their motions to reopen.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct based upon reasonable inquiry, knowledge, information, and belief.

Executed this 25th day of June 2017 in Detroit, Michigan.



Robert K. Lynch, Jr.
Deputy Field Office Director
ICE Detroit Field Office